

February 12, 2002

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C 20445

Re: Digital Audio Broadcasting Systems and Their Impact on the Terrestrial
Broadcast Service
MM Docket No. 99-325

Dear Mr. Caton:

On behalf of Evangelistic Alaska Missionary Fellowship, We are submitting these comments in response to the Commission's December 19, 2001 Public Notice in the above-referenced proceeding. In its Public Notice, the Commission requested comment on the National Radio Systems Committee's ("NRSC") recent evaluation of iBiquity Digital Corporation's ("iBiquity") FM IBOC system and the results of iBiquity's FM system tests. These submissions by the NRSC and iBiquity establish a record at the FCC demonstrating the need for digital audio broadcasting and the value iBiquity's IBOC system will bring to the U.S. listening public. Evangelistic Alaska Missionary Fellowship encourages the Commission to promptly endorse IBOC and the iBiquity system as the best means of implementing terrestrial digital audio broadcasting in the United States.

Evangelistic Alaska Missionary Fellowship is an independent owner of KJNP FM and KJNP AM radio stations serving Central Alaska. Our stations are concentrated in all markets and target listeners interested in a variety of programming. KJNP reaches out to the public in Alaska serving many areas where there is little or no other communication available. We provide news, public service, and inspirational programming of interest to all ages from children to senior citizens.

We have closely followed developments concerning IBOC and the Commission's commitment to ensure a digital future for terrestrial radio. The recent NRSC report on iBiquity's FM system adds to the information about IBOC that has been presented to the Commission over the past few years and provides ample justification for prompt Commission action endorsing IBOC as the digital future for radio broadcasters. The iBiquity test report demonstrates the FM IBOC system meets all the evaluation criteria for digital audio broadcasting the Commission has established. The NRSC report independently confirms iBiquity's conclusions. The NRSC found that the iBiquity system provides an opportunity for broadcasters to upgrade their analog systems by offering better sound quality and greatly enhanced resistance to the impairments that typically affect analog FM broadcasts. In particular, the iBiquity system's greatly improved resistance to multipath interference offers the potential for broadcasters to reach many listeners within their services areas that currently lack adequate analog reception. The NRSC also found that these benefits can be achieved without harming existing analog operations of either the station adopting the digital broadcast or adjacent channel stations.

The NRSC report and the iBiquity test results indicate numerous additional benefits of IBOC technology. In particular, Evangelistic Alaska Missionary Fellowship believes the new auxiliary data features that IBOC will enable will allow broadcasters to offer a range of new services that will greatly benefit

the American public. Terrestrial radio plays a unique role in American society reaching an extremely high percentage of the population on a regular basis. The IBOC system will allow these new data services to be offered to the widest possible range of Americans using a low cost transmission system. Although these new data services will be developed over time, Evangelistic Alaska Missionary Fellowship believes prompt introduction of IBOC will help foster this development.

Based on the foregoing, Evangelistic Alaska Missionary Fellowship encourages the Commission to take several steps. The Commission should clarify that it is no longer pursuing an out-of-band solution for terrestrial digital radio. iBiquity's demonstration of the viability and benefits of IBOC eliminate the need for examination of alternative approaches. The Commission should also endorse both IBOC as the specific solution for terrestrial digital radio and the iBiquity system. Finally, the Commission should take steps toward the adoption of a formal IBOC standard to encourage broadcasters, receiver manufacturers and consumers to upgrade to digital. This should include proposing rules that enable the introduction of IBOC at the earliest possible date.

For many years, terrestrial radio has remained on the sidelines as the Commission has developed a digital future for other broadcast and wireless technologies, such as the recently launched satellite radio service. The NRSC's validation of the benefits and viability of IBOC provides an opportunity for the Commission to deliver on its earlier promise to ensure a digital future for terrestrial radio. The transition from analog to digital broadcasting will take many years as broadcasters upgrade their facilities and consumers acquire digital receivers. Therefore, it is important for the Commission to provide a strong endorsement of this exciting new technology and establish the appropriate regulatory framework in order to encourage its widespread and prompt adoption.

Respectfully submitted,

Name: Yvonne L. Carriker

Title: Secretary/Treasurer